

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

JUAN CARLOS LEON-HERRERA,

Plaintiff,

v.

Case No. 2:24-cv-00153-MIS/GJF

JORGE ZUNIGA ISAIS d/b/a RVJ  
TRANSPORT; CUSTOM PRO  
LOGISTICS, LLC; THEY SYGMA  
NETWORK, INC.; AND CAL FRESCO,  
LLC.

Defendant.

**NOTICE OF COMPLETION OF BRIEFING**

Defendant, Custom Pro Logistics, LLC (“Defendant”) by and through its counsel of record, Mayer LLP (Brian J. Fisher and J. Ashley Cummings), hereby files this Notice of Completion of Briefing pursuant to D.N.M.LR-Civ. 7.4 and notifies the Court of the following:

1. Defendant, Custom Pro Logistics, LLC filed an Expedited Motion to Stay Discovery to Federal Rule of Civil Procedure 12(b)(6) on December 30, 2024. *See* Doc. 62.
2. Plaintiff filed his Response to Defendant’s Expedited Motion to Stay Discovery on January 10, 2025. *See* Doc. 75.
3. Custom Pro filed its Reply In Support Of Expedited Motion To Stay Discovery on January 17, 2025. *See* Doc. 84.

By submitting this Notice of Completion of Briefing, Defendant represents that the above-referenced Motion is ready for decision.

Respectfully submitted,

**MAYER LLP**

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## CERTIFICATE OF SERVICE

This is to certify that on January 21, 2025, a true and correct copy of the foregoing was forwarded to the following counsel of record via CM/ECF and electronic mail pursuant to Federal Rule of Civil Procedure 5:

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